



U.S. Department of Justice

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October 28, 2022

The Honorable Lydia Kay Griggsby
United States District Court for the District of Maryland
Garmatz Federal Courthouse
101 West Lombard Street
Baltimore, Maryland 21201

Re: *United States v. Farace et al.*,
Criminal No. LKG-21-294

Dear Judge Griggsby:

I write regarding the status of the above-captioned case. The two defendants in this case, Ryan Farace ("R. Farace") and Joseph Farace ("J. Farace"), were each charged in a one-count indictment with conspiracy to commit money laundering, in violation of 18 U.S.C. § 1956(h). Initial appearances for J. Farace and R. Farace occurred on October 6 and 8, 2021, respectively; in addition, R. Farace had his arraignment on October 8, 2021. On September 8, 2022, R. Farace pled guilty to Count One of the Indictment and sentencing is scheduled for January 5, 2023.

With respect to J. Farace, the plea offer extended by the Government on July 26, 2022 remains under consideration, and the parties continue to be in communication regarding its status. The parties anticipate having a final determination on a pre-trial resolution within 45 days, or December 12, 2022. Accordingly, the parties request that a further status update be scheduled for December 12, 2022, with the understanding that should a plea offer be signed in advance of that date, the parties will promptly seek a hearing with the Court. The Government also requests a tolling of the Speedy Trial clock through December 12, 2022, and will file that request in a separate motion and proposed order.

Respectfully submitted,

/s/

Coreen Mao
Assistant United States Attorney

cc: Gerry Ruter, Esq. (via ECF)
David Walsh-Little, Esq. (via ECF)